1 Eugene G. Iredale, SBN: 75292
2 Julia Yoo, SBN: 231163
   IREDALE and YOO, APC
3 105 West "F" Street, Fourth Floor
   San Diego, California 92101-6036
4 Telephone: 619.233.1525
   Facsimile: 619.233.3221
5
6 Attorneys for Plaintiff,
   JUAN CARLOS VERA
7
8   UNITED STATES DISTRICT COURT
               SOUTHERN DISTRICT OF CALIFORNIA
9   (Hon. M. James Lorenz)
10
11 JUAN CARLOS VERA   Case No. CV 10-1422-L(MDD)
12   Plaintiff,   **JOINT MOTION FOR**
                                       VOLUNTARY DISMISSAL OF
13   v.   **CLAIMS AGAINST DEFENDANT**
                                       HANNAH GILES WITH
14   **PREJUDICE PURSUANT TO**
   JAMES O'KEEFE III, an individual   **F.R.C.P 41(a)(2)**
15 HANNAH GILES, an individual, and
   DOES 1-20 inclusive,
16
17
               Defendants.
18
19
20   Pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiff Juan Carlos
21 Vera ("Vera") hereby moves to dismiss with prejudice all claims against Defendant
22 Hannah Giles ("Giles") in the above-referenced action. In support of this motion,
23 Vera states as follows:
24 1.   Vera and Giles have reached a mutually agreeable resolution of the claims at
25 issue in the above-referenced action.
26 2.   Vera's counsel has conferred with Giles's counsel, and received Giles's
27 consent to file this joint motion.

28

3.   Vera and Giles shall bear their own fees and costs.

Dated: July 20, 2012   Respectfully submitted,
                                        IREDALE & YOO, APC

                                   By */s/ Eugene Iredale*
                                        ─────────────────────────────
                                        Eugene Iredale
                                        Attorney for Plaintiff JUAN CARLOS VERA

Dated: July 20, 2012   Respectfully submitted,
                                        WILMER HALE

                                   By */s/ Benjamin Powell*
                                        ─────────────────────────────
                                        Benjamin Powell
                                        Attorney for Defendant HANNAH GILES

SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies

and Procedures Manual, I hereby certify that the content of this document is acceptable to

Wilmer Hale, counsel for Defendant Hannah Giles, and that I have obtained their

authorization to affix their electronic signature to this document.

Dated: July 20, 2012   /s/   Eugene G. Iredale
                                                  Eugene G. Iredale
                                                  Attorneys for Plaintiff
                                                  Juan Carlos Vera

2

MOTION FOR VOLUNTARY DISMISSAL OF CLAIMS AGAINST DEFENDANT HANNAH GILES WITH
PREJUDICE PURSUANT TO F.R.C.P 41(a)(2)

10-CV-1422-L